

## TEHAMA COUNTY RESOURCE CONSERVATION DISTRICT

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September 20, 1999

CALFED Bay-Delta Program 1416 Ninth Street Sacramento CA 95814 Attention: Rick Breitenbach

Dear Mr. Breitenbach:

The Tehama County Resource Conservation District submits the following comments on the CALFED Bay-Delta program Draft Programmatic EIS/EIR:

- It is clear from following the results of CALFED's public comment meetings that the
  agricultural community feels very threatened by CALFED. As watershed groups have
  had the opportunity to become part of the CALFED process, we urge CALFED to
  also find a way to include agricultural groups.
- A clarification of the function of Resource Conservation Districts (RCD) is in order. RCDs are non-regulatory public agencies that work in partnership with state and federal agencies to achieve conservation goals in their communities. They are comprised of a board of volunteers and sometimes have staff. They have no funding from state or federal government. Some RCDs have funding from county government, many do not. RCDs are not necessarily in a position to help local watershed groups. Either the RCD or the watershed group has to receive funding from another source to achieve their goals.
- CALFED's plan to fund local watershed groups for two years to get them started is not reasonable because:
  - Local fiscal support for watershed groups after two years is not likely in many, if not most, watersheds.
  - No other CALFED programs are being asked to achieve self-sufficiency in two years.
- The Bay-Delta's common program elements should be integrated through a holistic watershed approach. Watershed management links water use efficiency, water quality and environmental restoration by increasing overall watershed effectiveness in rural and urban areas. Water management, which CALFED is now emphasizing, relies on

constructing additional, massive public works like new dams, and proposes constructing new canals and diversions to increase water quality and enhance fisheries. Watershed management is linked to water management though, because it improves the existing water system while the proposed expansions of the existing water system are being studied and tested. Implementing watershed management should be a part of the reasonable use of the state's waters that precedes CALFED's implementation of additional large-scale water management projects.

 All watersheds that contribute water to the Delta and receive water from the Delta should be included in the watershed program of the CALFED EIR/EIS. Watershed rehabilitation in all these areas will help to reduce conflicts in the Delta, a stated goal of CALFED.

Thank you for accepting TCRCD's comments on the CALFED Bay-Delta Program Draft Programmatic EIS/EIR.

Sincerely,

Vicky Dawley

Watershed Coordinator

Tehama County Resource Conservation District